

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

LOURDES CHAAR PADIN

Plaintiff

v.

THE DEPARTMENT OF EDUCATION OF  
PUERTO RICO (BOARD OF EDUCATION)  
& COMMONWEALTH OF PUERTO RICO

Defendants

CIVIL: 24-1351 (GMM)

About: Age Discrimination in Employment  
Act of 1967 (ADEA), Americans with  
Disabilities Act of 1990 (ADA), Law 504  
retaliation

**INFORMATIVE MOTION AND TO REQUEST ASSIGNMENT OF BANKRUPTCY  
COUNSEL**

TO THE HONORABLE COURT:

COMES NOW the plaintiff Lourdes Chaar Padin (hereinafter, the “Plaintiff”) in this action represented by her attorney and before this Honorable Court respectfully states, alleges and prays as follows:

1. On March 26, 2025, this Honorable Court entered an Order staying the proceedings in the above-captioned case pending the determination by the Title III Court as to the applicability of the Discharge Injunction to Plaintiff’s claim. (**Docket No. 27**)
2. The undersigned counsel has conferred with Plaintiff, Ms. Chaar, to explain the implications of the Court’s Order, including the necessity of proceedings before the Title III Court and how such proceedings directly impact the continuation of her claims in this forum.
3. Plaintiff was appointed the undersigned counsel due to her indigence and her inability to secure private legal representation, having initially filed this action pro se. (**Docket Nos. 2-3, 5 and 9**)

4. While the undersigned counsel remains committed to representing Plaintiff in the employment-related claims pending before this Court, counsel respectfully informs this Honorable Court that her practice focuses exclusively on labor and employment law. The undersigned counsel lacks experience in bankruptcy law, particularly with the specialized and complex procedures governing Title III proceedings under PROMESA.

5. Given the complexity and significance of the issues to be adjudicated before the Title III Court, the undersigned counsel believes that Plaintiff would be severely disadvantaged without competent bankruptcy representation. In good conscience—and to avoid doing a disservice to Ms. Chaar—counsel, after careful consultation with Plaintiff, respectfully submits that the appointment of qualified bankruptcy counsel for the limited purpose of the Title III proceedings is necessary to protect Plaintiff's rights and ensure her access to justice.

6. The undersigned counsel has fully explained to Ms. Chaar the nature of the stay issued by this Honorable Court and the necessity of engaging in proceedings before the Title III Court as a prerequisite to resuming this litigation.

7. Ms. Chaar has expressed her full understanding of these circumstances and agrees that the appointment of experienced bankruptcy counsel is essential to her ability to effectively pursue her claims. Accordingly, she has authorized the undersigned counsel to respectfully request that this Honorable Court appoint bankruptcy counsel for the purpose of representing her before the Title III Court.

8. That once the Title III Court issues a determination as to the applicability of the Discharge Injunction to Plaintiff's claim, the undersigned is willing to continue representing Ms. Chaar in the employment-related aspects of this case before this Court.

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court (a) take notice of the above informed, (b) appoint or otherwise facilitate the appointment of qualified bankruptcy counsel to represent Ms. Chaar before the Title III Court; and (c) grant such other and further relief as this Court may deem just and proper.

RESPECTFULLY REQUESTED.

In San Juan, Puerto Rico, this 25<sup>th</sup> day of April, 2025.

s/Tatiana Leal-González  
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**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that on this date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically serve a copy on the attorneys of record. Parties may access this filing through the Court's system.

s/ Tatiana Leal-González  
Tatiana Leal González